

MICHAEL A. ARMSTRONG & ASSOCIATES, LLC

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Attorney for City of Atlantic City

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

MOHAMED ELLAISY,

Plaintiff,

V.

STERLING WHEATEN, BRIAN HAMBRECHT,
MATTHEW ROGERS, JUANITA HARRIS,
CITY OF ATLANTIC CITY, JOHN
APPLEGATE, MICHAEL ATKINSON,
MICHAEL ORDONEZ, BORGATA HOTEL AND
CASINO, and UNKNOWN BORGATA
SECURITY PERSONNEL,

Defendants.

Docket No.:
1:13-cv-05401-NLH-JS

**NOTICE OF MOTION FOR
SANCTIONS**

TO: Jennifer Bonjean, Esquire
Bonjean Law Group, PLLC
467 Saint Johns Place,
Brooklyn, NY 11238

PLEASE TAKE NOTICE that on June 7, 2021 at 9:00 am or as soon thereafter as counsel may be heard, the undersigned attorney for Defendant, City of Atlantic City shall move before the United States District Court, at the Mitchell H. Cohen Building and United States Courthouse, Fourth and Cooper Streets, Camden, New Jersey, for the entry of an Order to sanction Plaintiff or his attorney.

PLEASE TAKE FURTHER NOTICE that Defendant will rely upon the accompanying brief and certification of counsel.

A proposed form of order is attached hereto.

MICHAEL A. ARMSTRONG & ASSOCIATES, LLC

By: /s/ *Morrison Kent Fairbairn*
Morrison Kent Fairbairn, Esquire
Attorney for Defendant Atlantic City

Dated: April 30, 2021